REMARKS/ARGUMENTS:

In the Office Action dated August 2, 2006, the Examiner has rejected the pending claims 1-16 and 18-20. More specifically, the Examiner rejected claims 1-10 and 16 under 35 USC 102(e) as being anticipated by Wright (US 6912605). The Examiner has rejected claims 11-15 under 35 USC 103(a) over Wright in view of Kammer (US 6950645). Respectfully, the applicant maintains that the Examiner has only made the connection between Wright and the present invention using impermissible hindsight analysis. Therefore, we disagree with the Examiner and traverse the rejection.

Claims 2-16 and 19-20 have been amended to recite "The" as requested by the Examiner. The Examiner is requested to remove the objections to these claims. A merely clarifying amendment has been made to claims 1-16 and 18

The claimed invention relates to a device having a first mode and a second mode and a touch entry user input device for user input. The device is operable to perform a first function when it is in the second mode, but not when it is in the first mode (par. [0017]). The device is arranged to initiate exit from the first mode and entry to the second mode <u>at the initiation</u> at the user input and to perform the first function at the completion of the user input (par. [0020]).

An exemplary embodiment of the invention provides an advantage, in that the exit from the first mode to the second mode can be initiated before the type of user input is discriminated. For example, there is no need to discriminate between a long press of a key and a short press of a key before the device can switch between modes. This feature of the invention reduces the reaction time when using the device because the device can enter the second mode <u>at the initiation</u> of the user input. Thus, the device has already entered the second mode by the time the input has been discriminated (par. [0015]). Another exemplary embodiment of the invention relates to the feature that there is no delay between discriminating the user input and sending a message identifying the user input (par. [0019]).

Wright discloses a method for implementing security in wireless communications between devices such as a keyboard and computer by altering the timing between particular input packets. (col. 3, lines 66-67). Wright further discloses that a device such as a wireless keyboard often has a "sleep mode" in which the current consumed by the keyboard is minimized so as to increase battery life and that "The act of a key switch being executed typically wakes up the keyboard controller to a state that consumes several mA" (col. 5, lines 42-43). Once the keyboard has entered the higher powered state it can compute the state of the key matrix and transmit the key state information to a computer via a radio transmitter.

The Examiner rejects claim 1 as anticipated by Wright. The Examiner states that Wright anticipates "wherein the device has means for user input and is arranged, when in first mode, to initiate exit from the first mode and entry into the second mode at the initiation of a user input." The Examiner cites Wright at column 5, lines 40-50. Respectfully, the applicant traverses the Examiner's rejection.

Claim 1 recites:

A device having a first mode in which the device does not perform a first function and a second mode in which the device does perform the first function wherein the device has a touch-entry user input device for user input and is arranged, when in the first mode, to initiate exit from the first mode and entry into the second mode at the initiation of a user input and to perform the first function at the completion of the user input.

Wright discloses "The act of a key switch being executed typically wakes up the keyboard controller" (col. 5, lines 42-43). However, claim 1 recites in part, "**entry into the second mode at the initiation of a user input.**" Wright does not disclose any distinction being made between the initiation of a key press and the completion of a key press. Wright merely discloses "The act of a key switch being executed" (col.

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5, line 47). Furthermore, Wright discloses, after the key switch is executed, "Having computed the state of the matrix, the controller will turn on a radio transmitter" (col. 5, lines 44-45). Wright does not disclose the key switch "**to initiate exit from the first mode and entry into the second mode at the initiation of a user input**" as claim 1 recites in part. Nor does Wright disclose "**to perform the first function at the completion of the user input**" as claim 1 recites in part. Therefore, Wright does not anticipate claim 1, and claim 1 should be allowed.

In addition, for at least the reason that claims 2-16 depend from claim 1, all of the claims 1-16 should be allowed.

The Examiner has rejected Claim 18 under 35 USC 102(e) over Wright. The Applicant traverses this rejection.

Claim 18 as now further clarified by amendment recites in part the steps of "**detecting the initiation of user input and then immediately initiating the transfer;** and "**detecting the completion of the user input and performing first function.**" As stated above, Wright does not disclose any distinction between the initiation of a key press and the completion of a key press. Therefore, for these reasons claim 18 should be allowed.

Furthermore, for at least the reason that claims 19 and 20 depend from claim 18, all the claims 18-20 should be allowed.

The Examiner rejects claims 11-15 under 35 USC 103(a) as being unpatentable over Wright in view of Kammer. We disagree with the rejection.

Kammer relates to a method in a Bluetooth wireless network comprising Master and Slave responder devices, to manage the discovery process and to reduce the burden on the power resources available to the devices (col. 14, lines 12-15). In Kammer, this is partially accomplished by allowing the responder devices to remain in sleep mode for a longer period of time, and "Consequently, devices in the wireless

network will exchange fewer messages, simplifying the device discovery process for users as well as conserving the power (battery) resources of initiator devices as well as responder devices" (col. 5, lines 10-14). Kammer discloses "In essence, the on/off switch of responder device 730 also functions as the mechanism by which the user selects either discoverable non-discoverable mode" (col. 13, lines 1-4). However, Kammer does not disclose any distinction between the initiation of a user input and the completion of a user input. Therefore, Kammer does not disclose a method to "**to initiate exit from the first mode and entry into the second mode at the initiation of a user input**" as claim 1 recites in part. Nor does Kammer disclose "**to perform the first function at the completion of the user input**" as claim 1 recites in part.

Therefore, even though the applicant does not admit that the combination of Wright and Kammer is suggested or is technically feasible; if the references were combined, the result still would not suggest or make obvious the subject matter of claim 1, from which claim 11-15 depend. Therefore, the claims 11-15 should be allowed.
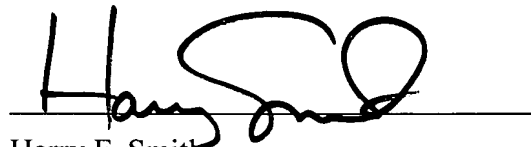
Claim 22 has been added. Support for the amendments can be found at least at paragraphs [0019] and [0020]. No new matter is added.

As claim 22 incorporates features of the claims 1 and 18 as described above; neither Wright nor Kammer disclose, teach or suggest claim 22. Therefore, Claim 22 should be allowed.

For the above mentioned reasons, the applicant maintains that the present invention is both new and non-obvious with respect to the references that were cited and applied by the Examiner. The Examiner is respectfully requested to review the claims in view of the above arguments, to withdraw the rejections and to pass claims 1-16, 18-20 and 22 to issue. The undersigned representative welcomes the opportunity to resolve any matters that may remain, formal or otherwise, via teleconference at the Examiner's discretion.

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